

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BERNARD ROSS HANSEN, and  
DIANE RENEE ERDMANN,

Defendants.

Case No. CR 18-0092-RAJ

**DECLARATION OF DIANE  
ERDMANN**

I, Diane Erdmann, declare as follows:

1. I am over eighteen years of age and am competent to testify herein. I make the following statements based on my personal knowledge.

2. Over the past five years, I have experienced progressive hip pain with increasing difficulty with ambulation. My doctor has informed me that I have severe end-stage arthritis of both hips and that I require total hip replacement in order to reduce my pain and remain ambulatory.

3. I am currently working with my care team to schedule hip replacement surgery, which would require two operations at least six weeks apart, followed by two additional weeks of

1 recovery. My understanding is that the earliest I could have these surgeries and my two weeks of  
2 recovery completed would be March 25, 2022.

3 4. My understanding is that between my surgeries and during my two-week recovery  
4 after the second surgery, I will need full-time, 24-hour care.

5 5. I am currently researching potential post-surgical care options. I do not currently  
6 have an income, or remaining financial assets, and so my options are limited to friends, family, or  
7 insurance-provided options, which may not be available. At this time, the person in the best  
8 position to care for me during recovery is Ross Hansen. I have no other family or friends able to  
9 provide the care that I will need.

10 I declare under penalty of perjury under the laws of the United States of America that the  
11 foregoing is true and correct.

12 DATED this 21st day of December, 2021, at Auburn, Washington.

13   
14 Diane Renee Erdmann